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Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

Forty-fifth session
Geneva, 23 June – 02 July 2014
Item 7 (f) of the provisional agenda
Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: marking and labelling

Marking of inner receptacles of composite IBCs

Transmitted by the International Confederation of Plastics Packaging Manufacturers (ICPP)[1]

Background

1. At the forty-fourth session of the Sub-Committee, the marking of the date of manufacture of plastics inner receptacles of composite IBCs was discussed in detail on the basis of ICPP informal document INF 58.

2. The discussion showed that:

- The wording in para. 6.5.2.2.4 does not underline the necessity of a marking on inner receptacles of composite IBCs, including the date of manufacture of the inner receptacle;
- A reference should be made to the fact that the date of manufacture of the inner receptacle may be different to the date of manufacture of the completed composite IBC, placed on the plate on the outer casing;
- As result of repair or remanufacture the date of manufacture of the inner receptacle and the marked date of repair or remanufacture are in most cases different.

[1] In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

3. In the report of the session (ST/SG/AC.10/C.3/88) the results of the discussion are summarized as follows:

> *122. The Sub-Committee noted that the amendment to 6.5.2.2.4 adopted during the last biennium on the basis of an oral proposal (ST/SG/AC.10/C.3/84, para.49) and concerning the marking of the date of manufacture caused problems for the industry in the case of composite IBCs.*
>
> *123. There was no consensus on the proposed deletion of the new sentence. However, given the date shown on the inner receptacle may differ from the date on the outer casing, it was agreed, as an interim solution, to delete the word "primary" from the sentence as a correction (see ST/SG/AC.10/1/Rev.18/Corr.2). The representative of ICPP will prepare a new proposal of amendment to 6.5.2.2.4 for the next session in order to address the issue of marking of composite IBCs.*

4. ICPP proposes to

- Underline the need of marking of the inner receptacle of composite IBC's (the inner receptacle has to correspond to the inner receptacle of a successfully tested design type);
- Add a further note in 6.5.2.2.4 that the date of manufacture of the inner receptacle may be different from the marked date of manufacture, repair or remanufacture of the completed IBC;
- Simplify the text of the first sentence by transforming the beginning of the provision in an additional note in line with the used wording in the note of 6.5.2.2.2.

Proposal (new text in bold)

5. Rephrase the first sentence of 6.5.2.2.4 to read as follows:

> **"Inner receptacles that are of composite IBC design type shall be identified by the application of** the markings indicated in 6.5.2.1.1 (b), (c), (d) where this date is that of the manufacture of the plastics inner receptacle, (e) and (f)."

6. Indicate the present "Note" as **"Note 1"**

7. Add a second note as follows:

> "***NOTE 2:*** *The date of manufacture of the inner receptacle may be different from the marked date of manufacture (see 6.5.2.1), repair (see 6.5.4.5.3) or remanufacture (see 6.5.2.4) of the composite IBC.".*

8. Add a third note as follows:

> "***NOTE 3:*** *The provisions in 6.5.2.2.4 shall apply to all composite IBC's manufactured, repaired, or remanufactured as from 1 January 2011.".*